

**From:** Donald Woodside <woodside@mcmaster.ca>  
**To:** <wvogl@samhsa.gov>  
**Date:** 7/10/04 11:35AM  
**Subject:** Fed register Doc 04-7984

8400244

Dept of Health and Human Services

RE; Comments on FR doc 04-7984

I am writing to ask you to withdraw the proposed revisions to Mandatory Federal Workplace Drug Testing guidelines. I am an advisory board member of the International Paruresis Association, a psychiatrist, and a paruretic myself ( paruresis = shy bladder syndrome). Although I am a Canadian, I am commenting on an American law in my capacity as an expert in the field. Shy bladder sufferers are very private about their problem, and most have not disclosed to anyone in their workplace, as it may well make their problems with urinating at work more difficult. As a psychiatrist I am aware of the numbers of Americans who have social phobia, of which shy bladder is a common symptom ( the question 'do you have trouble peeing in a public washroom', is a common screening for social phobia , a widespread anxiety disorder).

It is essential that any new regulations around collection of urine samples respects the DISABILITY of PARURESIS, and makes possible drug testing by other means, such as oral fluids, hair etc, for those self declared as paruretic.

Sincerely

Donald Woodside  
42 Thorndale Cres  
Hamilton Ontario  
L8S 3K2